

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Western District of Texas**FILED**

July 01, 2025

CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS

United States of America

v.

BY: APV

DEPUTY

Case No. EP: 25-M-3752-MAT

Monica CEBALLOS-DELGADO*Defendant(s)***CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of June 6, 2025 in the county of El Paso in the
Western District of Texas, the defendant(s) violated:*Code Section**Offense Description*

8 U.S.C. § 1326(a)

Illegal Re-Entry

This criminal complaint is based on these facts:

☒ Continued on the attached sheet.*Complainant's signature*Nicole Chinn, HSI Special Agent*Printed name and title*

- ☐ Sworn to before me and signed in my presence.
☒ Sworn to telephonically and signed electronically.

Date: July 1, 2025 at 12:47 p.mCity and state: El Paso, Texas*Judge's signature*Miguel A. Torres, United States Magistrate Judge*Printed name and title*

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS

Vs

Monica CEBALLOS-DELGADO

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Nicole Chinn (Affiant), a Special Agent of Homeland Security Investigations (HSI), being duly sworn, hereby states:

AGENT BACKGROUND

1. I am a Criminal Investigator of the United States, with authority that is derived by Congress, since the passing of the Homeland Security Act of 2002, to conduct investigations and to make arrests for various offenses, regarding national homeland security efforts.
2. I am an HSI Special Agent assigned to the HSI Task Force, located at the office of the HSI Special Agent In Charge in El Paso, Texas (SAC El Paso). I have been employed with HSI since March of 2022. I graduated from the Criminal Investigator Training Program and the HSI Special Agent Training at the Federal Law Enforcement Training Center, in Brunswick, Georgia, in November of 2022. Prior to my employment with HSI, I was employed as a United States Border Patrol Agent for approximately 12 years, and stationed in Nogales, Arizona. As an HSI Special Agent of the HSI Task Force of SAC El Paso, I investigate members of human smuggling organizations and conspiracy human smuggling activities.

PURPOSE

3. This affidavit is submitted in support of a criminal complaint, charging Monica CEBALLOS-DELGADO with violations of Title 8 U.S.C. § 1326 – Re-Entry of Removed Aliens.

PARAMETERS

4. The information contained in this affidavit is based upon my investigation of this matter as well as my training and experience, and the training and experience of other law enforcement officers. Since this affidavit is being submitted for the limited purpose of demonstrating probable cause, it does not contain all the information known to me or other law enforcement officers involved in this investigation. I have set forth only those facts that I believe are necessary to establish probable cause to believe that there is evidence of a violations of Title 8 U.S.C. § 1326(a) – Illegal Re-Entry.

STATEMENT OF FACTS

On or around June 11, 2025, Affiant received information regarding the commission of a criminal offense that occurred on June 6, 2025, in Canutillo, Texas. According to a El Paso County Sheriff's Office (EPCSO) report, on June 6, 2025, a Sheriff's Deputy was dispatched to an apartment unit on the 7000 block of 2nd St. in Canutillo, Texas. This residence is within the Western District of Texas.

Affiant obtained the EPCSO incident report which details an "Assault by Contact" offense in which Monica CEBALLOS-DELGADO (hereinafter "DEFENDANT") was an involved party. The incident report lists the date of birth of the DEFENDANT and indicates the 2nd St. apartment unit in Canutillo, Texas to be the DEFENDANT'S current residence. The report indicates the DEFENDANT presented a Mexican identification card to the deputy to identify herself.

Law enforcement database queries of DEFENDANT revealed that the DEFENDANT is a citizen and national of Mexico without documents to pass, be, or remain in the United States, legally. The DEFENDANT was previously removed from the United States to Mexico, on or about February 13, 2008, by a Customs and Border Protection Officer at the Paso Del Norte port of entry in El Paso, Texas. The DEFENDANT was apprehended on February 13, 2008, while making a false claim of owning a genuine B1/B2 Border Crossing Card, of which DEFENDANT was not its true bearer. The DEFENDANT currently has no status to be in the United States legally.

Based on the EPCSO encounter, affiant knows that the DEFENDANT has re-entered the United States without the permission of the United States Attorney General nor the Secretary of Homeland Security. The DEFENDANT does not have any visa applications approved or pending.

Your affiant makes this affidavit based on her personal knowledge, as well as the basis of information furnished to her by other law enforcement officers. This affidavit is being submitted for the limited purpose of establishing probable cause for the arrest of Monica CEBALLOS-DELGADO and does not set forth all your affiant's knowledge about this matter.